

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

AMPERSAND PUBLISHING, LLC
d/b/a Santa Barbara News-Press,

Petitioner,

NATIONAL LABOR RELATIONS
BOARD,

Respondent.

GRAPHICS COMMUNICATIONS
CONFERENCE OF THE
INTERNATIONAL BROTHERHOOD
OF TEAMSTERS,

Intervenor,

CASE NO. 15-1074, 15-1130

**UNOPPOSED MOTION OF INTERVENOR FOR AN EXTENSION
OF TIME FOR FILING ITS BRIEF**

To the Honorable, the Judges of the United States Court of Appeals for the District
of Columbia Circuit:

Intervenor Graphics Communications Conference Of The International
Brotherhood Of Teamsters by undersigned Counsel, respectfully moves this Court
for a 30-day extension of time from August 31, 2016 to September 30, 2016, for
filing its brief. In support of its motion, Intervenor shows as follows:

1. The Intervenor's brief is due August 30, and Intervenor has not previously requested an extension in this case.
2. The Court previously granted an unopposed motion of Ampersand Publishing, LLC ("the Company") for a 2-month extension of time to file its opening brief from November 24, 2015 to January 25, 2016.
3. On January 18, 2016, the Company filed an opposed motion to exceed word limits based on the complexity of the case and the length of the record. Briefing was suspended by the Court's order dated January 22, 2016, pending the Court's ruling on that motion. The court granted the motion in part on March 31, 2016. At that time, the Court set May 16, 2016 as the due date for the Company's opening brief and June 30, 2016 as the due date for the Intervenor's brief.
4. On May 24, 2016, the National Labor Relations Board filed an unopposed motion seeking a 2-month extension to file its brief. On June 1, 2016, this Court ordered that the NLRB's brief would be due August 15, 2016, Intervenor's brief would be due August 30, 2016, and the Company's reply brief would be due September 14, 2016.
5. Undersigned counsel is responsible for, *inter alia*, the following pressing matters: a) an arbitration brief for the International Association of Machinists and Aerospace Workers, in an employee discharge case against American Airlines; b) preparation for and participation in an August 30, 2016 mediation in San

Francisco on behalf of a Defendant in *American Maritime Officers v. American President Lines, Masters, Mates & Pilots, et al*, (ND CA 16-CV-00861-EMC), followed by a motion to dismiss in that case if it does not settle; c) significant litigation activity in *Pauley v. CF Entertainment et al*, (CD CA 13-CV-8011/8012 – R); and d) a summary judgment motion to be filed for plaintiff union in *IAMAW v. County of Miami-Dade* (Case No. 2015-008523-CA-01, 11th Judicial Circuit, Fla).

6. Due to Intervenor counsel’s above-described commitments, it will not be possible for Intervenor counsel, with due diligence and giving priority to the preparation of the brief, to file the brief by its current due date of August 30, 2016.

7. Counsel for the National Labor Relations Board stated they do not oppose this motion. Counsel for the Company stated they “would not oppose” the request “assuming the Union has good cause for its extension.”

8. Oral argument has not been scheduled.

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WHEREFORE, the Intervenor respectfully requests that the Court grant this motion and extend the time for filing its brief to and including September 30, 2016.

DATED at Glendale, California, Respectfully submitted,
this 17th day of August, 2016

BUSH GOTTLIEB, A Law Corporation

By: /s/Ira L. Gottlieb

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OF TEAMSTERS

CERTIFICATE OF SERVICE

I hereby certify that on August 17, 2016, copies of the foregoing **Unopposed Motion of Intervenor For An Extension Of Time For Filing Its Brief** was served on the following counsel of record through the CM/ECF system if they are registered users, or, if they are not, by serving a true and correct copy at the addresses listed below:

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/s/IRA L. GOTTLIEB _____

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